

Morse, Bob

From: Olsen, Marian
Sent: Wednesday, August 24, 2016 8:36 AM
To: Morse, Bob
Cc: Metz, Chloe
Subject: Comments on Installation Specific Work Plan at the Former Griffiss Air Force Base

Hi Bob,

As requested, I reviewed the Draft Site Investigations of PFC Release Areas at Multiple BRAC Installations – Installation-Specific Work Plan at the Former Griffiss Air Force Base. Based on this review, I have the following comments:

1. The document indicates that groundwater will not be evaluated since a public water supply is available. Consistent with guidance exposures to groundwater are evaluated as a future exposure pathway and this should be included in the workplan and also in the human health risk assessment.
2. The document identifies a number of exposures pathways in the Table 10 series without identifying the routes of exposure. In some cases, the pathways are identified, while in other cases pathways are not listed. It is important to identify the exposures pathways to assure that samples are collected at the appropriate depths and the CSM identifies completed exposure pathways under current and future land use considerations.
3. The introductory information indicates that future iterations of this work plan will adopt the new Health Advisory values as comparison thresholds. In addition, any updates to Agency guidance on the evaluation of the toxicity of PFCs will need to be considered in the development of the workplan for the HHRA.
4. The document indicates on Worksheets Series #18 the planned sampling approach. In finalizing these workplans, considering the ubiquitous use of PFCs in various materials it is important to consider methods for avoiding possible cross contamination during sampling. This comment should incorporate any issues raised by Edison regarding sampling equipment.

Please let me know if you have any questions.

Marian